

## MEETING NOTES

MEETING: ***Gulfco Marine Maintenance Superfund Site –Wetland Sediment Hot Spot Remediation Meeting***

LOCATION: EPA Region 6 - Dallas, TX

DATE: May 17, 2010

ATTENDEES: See Attached Attendee List

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The agenda for the meeting area attached. Eric Pastor and Kirby Tyndall reviewed the presentation slides distributed prior to the meeting, which outlined the proposed wetland sediment hot spot remediation program and risk management considerations for other areas/media.

Following the presentation, Gary Miller indicated that EPA was open to the proposed sediment program but not in lieu of further ecological investigation through the BERA. Barbara Nann indicated that EPA would need more data to be comfortable with the proposed wetland sediment hot spot remediation program in lieu of the BERA. Barbara specifically mentioned the following areas of concern:

- Data assumptions used to establish background levels, specifically for zinc in soils and wetland sediment;
- Assumptions related to the lack of habitat in the South Area of the Site.
- Additional data to support the lack of a need for remediation in the barge slip areas.

Barbara noted that EPA staff have been directed by management to limit the back forth submittal of document revisions and that EPA (for all sites) would allow one revision and if that revision was not acceptable, EPA would consider other actions, including potentially taking over the project.

With regard to the above areas of concern, the group explained that the background samples were collected from an area pre-approved by EPA prior to sampling and that this area was located only several hundred feet away from the original proposed background sample location that could not be sampled due to the landowner's refusal to grant access. It was also noted that the background data from this area were provided and explained in the Nature and Extent Data Report (NEDR), which had been previously approved by EPA. EPA noted concerns related to an increasing zinc concentration trend from east to west in the background area and that the higher concentrations were far above TCEQ's default background zinc soil concentration (30 mg/kg). The Group noted that NEDR described an outlier test performed using EPA's ProUCL software that had indicated no outliers within the dataset of 10 background zinc samples and explained that the locally higher zinc in this area could be due to anthropogenic sources not related to the Site such as the dredge spoil used to create the upland areas at the Site and along Marlin Avenue or other local zinc paint or similar sources. Susan Roddy suggested that any data documenting/explaining the presence of higher zinc concentrations in the dredge spoil would be useful.

The rationale for the lack of habitat in the South Area soils was also reviewed. This included the fact that much of the South Area consisted of engineered fill, compacted soil, or shell hash material not suitable for soil invertebrates, as well as a lack of vegetation. The historical site usage for commercial/industrial purposes, resulting in compacted soils, and the likely future use due to restrictive covenants were also mentioned. Possible additional soil surveying/sampling for habitat evaluation purposes was also discussed.

Gary Miller asked why certain wetland sediment and barge slip sediment areas that were proposed for additional sampling in the BERA work plan were not targeted for hot spot remediation. The Group explained that the BERA sampling locations were selected for risk assessment purposes based on comparison to ERL values. The remediation locations were selected for risk management purposes based on comparisons to the midpoint between the ERL and the ERM and a consideration of the data overall (i.e., data for adjacent locations, overall PAH concentrations relative to the ERL-ERM midpoint, etc.). For example it was noted that only one location in the barge slips had an exceedence of the ERL-ERM midpoint and that was for a single analyte. Specific reasons for why excavation was not proposed at individual sample wetland sediment locations, such as NB2SE06, as explained in the April 29, 2010 draft of the Wetland Sediment Hot Spot Remediation Work Plan (Wetland Sediment Work Plan) were also explained. The addition of several more excavation areas to address sample locations with elevated zinc concentrations, such as SB-202, in the North Area was proposed.

Gary Miller noted that TCEQ has provided comments on the Wetland Sediment Removal Action Work Plan but he has not yet received them. One of the comments was the inclusion of verification samples from excavation areas. It was agreed that this need could be addressed by additional pre-excavation sampling to delineate the hot spot area boundaries. Gary Miller said that he would be looking at this comment and would provide suggested locations for those samples.

Addition discussion focused on the Removal Action AOC, the status of EPA's revisions to the AOC and the Removal Action memorandum. It was noted that if the wetland sediment removal action was not possible or could not be performed in the near term, the Gulfco Group would request that the AOC for the tank removal action component be finalized as soon as possible to allow completion of that work prior to the heart of this year's hurricane season. Gary noted that the Removal Action Work Plan for tank farm removal and former surface impounds cap repair had been approved.

### **Action Items**

1. Within approximately one week from meeting, EPA to provide a written summary of what additional information they would need to get comfortable with a wetland sediment hot spot removal action and whether such a removal action could be performed in lieu of additional BERA investigation based on a risk management decision. Gulfco Group to review that information and a follow-up conference call or meeting to be held.
2. In anticipation of the above action item, Gulfco Group to provide a write-up of existing information supporting the lack of habitat in the South Area (to be augmented by additional field assessment if needed).
3. EPA to provide comments on the Wetland Sediment Removal Action Work Plan, including pre-excavation sampling locations.
4. EPA to provide current wording (latest draft) of Removal Action AOC.
5. EPA to provide Removal Action Memorandum when completed.
6. EPA to provide a current statement of oversight costs for the project.

## **AGENDA**

### **Wetland Sediment Hot Spot Remediation Meeting Gulfco Marine Maintenance Superfund Site May 17, 2010**

- I.     **Introductions**
- II.    **Meeting Objectives**
- III.   **Wetland Sediment Hot Spot Remediation Proposal**
  - A. Overview
  - B. Description
  - C. Schedule
  - D. Identification of Wetland Sediment Hot Spots
- IV.    **Risk Management Considerations for Other Media/Areas**
  - A. South Area Soils
  - B. North Area Soils
  - C. Intracoastal Waterway Sediments
  - D. Pond Sediment
  - E. Wetlands Surface Water
  - F. Pond Surface Water
- V.     **Possible Next Steps for Implementation of Wetland Sediment Hot Spot Remediation Program**
  - A. Review of Proposed Wetland Sediment Hot Spot Remediation Wording/Addition to Removal Action AOC
  - B. Review of Proposed Wetland Sediment Hot Spot Remediation Removal Action Work Plan Section/Addition to Removal Action Work Plan
  - C. Others?

# GULFSCO SITE MEETING - 5/17/2010

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